

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re: ) CASE NO: 11-44752-399 Chapter 13  
MARRIEL L BILLINGSLEY )  
 ) Trustee's Objection to Confirmation  
 )  
 ) Original confirmation hearing  
Debtor(s) ) set for Jul 11, 2011 10:00 AM

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** John V. LaBarge, Jr., Standing Chapter 13 Trustee, and for his objection to confirmation states as follows:

1. The plan does not provide sufficient funds to pay all creditors entitled to full payment, including fair market value of secured claims and priority debts. 11 USC Secs. 1322(a)(2) & 1325(a)(5)(B)(ii)
2. The Trustee has not received a copy of the most recently filed Federal tax return.
3. The set monthly payments to be made by the Trustee exceed the plan payment.
4. The plan is ambiguous or incapable of ascertainment (11 U.S.C. Secs. 1321 & 1325(a)(3)) because:  
PLAN FAILS TO ADDRESS POST PETITION MORTGAGE PAYMENTS  
AND CONTAINS INSUFFICIENT FUNDS TO PAY THESE DEBTS  
IN FULL.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

KLW-221

Copy served on the following either  
through the Court's ECF system or by  
ordinary mail on June 2, 2011 :

LEGAL HELPERS PC  
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ST LOUIS MO 63101

MARRIEL L BILLINGSLEY  
1627 CHESLEY DR  
SAINT LOUIS MO 63136

/s/ John V. LaBarge, Jr.

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John V LaBarge Jr  
Chapter 13 Trustee  
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